

## REMARKS/ARGUMENTS

In the claims, Claims 1-34 are pending in the above-referenced application.

Claims 1-21 have been previously examined and Claims 22-34 are new.

5            Claims 1-3 and 5-21 were rejected by the Examiner under 35 U.S.C. §102 as being anticipated by Banga et al "Optimistic Deltas for WWW Latency Reduction," in Proc. 1997 SENIX Technical Conf., pp. 289-303, Anaheim, CA January, 1997. Claim 4 was rejected under 35 U.S.C. §103(a) as being unpatentable over Banga in view of Sutcliffe (U.S. Pat. No. 6,253,216).

10           The Applicant traverses these rejections and offers the following arguments in response.

### *Regarding Banga:*

Banga teaches methods of using deltas to update cached pages that are not current. The cached page is first sent in response to a client request and, at the same time  
15       a request is sent to a content provider for any delta information (a server is contacted). If the delta information is later received by the client it can be used to update the previously sent page. At the time the page is requested by the client, the delta information is not available at the client or at the cache. If it were, then it could be applied to the cached page prior to the client request and most of Banga's teaching would be unnecessary. In  
20       Banga, any updates are applied before the sent cached page is shown to a user (Banga pg 290 Col. 2 line 18). Banga also teaches a similar approach wherein the cached, possibly not current, copy is stored on the client and a cache server is accessed to retrieve delta information.

*Regarding Claim 1:*

Claim 1 recites a method for updating a configuration page on a user side of an Internet-based configuration system without having to contact a server side of the configuration system. As described in the application, a configuration page is, for example, a page used in the context of product configuration over the Internet (page 3, line 21). The configuration page may also be configured to solicit input from a user (page 7, line 13). Claim 1 further recites “responsive to the user side receiving a user input that is associated with delta configuration page information available at the user side, retrieving the delta configuration page information; and updating the configuration page based on the delta configuration page information.”

In the current office action the Examiner suggests that Banga teaches all aspects of this claim. For example, in the current office action the Examiner suggests that Banga teaches sending changes to a client without making contact with a server. In response, the applicant respectfully points out that Banga does not update the configuration page *without having* to contact a server side of the configuration system. In fact, both methods disclosed in Banga include accessing data from a server, either a cache server or a server of a content provider (See, for example, Banga figure 1). Specifically, on the bottom of page 2 of the office action it is stated “sending delta page for updating the changes from the proxy cache to client without making contact with the content provider...” The Applicant points out that the proxy cache is in itself a server and thus a server is contacted in the teachings Banga. This additional contact is one of the prior art problems that some embodiments of the invention may overcome (Specification page 2, lines 7-9).

In the invention, it is not necessary to contact a server to update a page because “delta configuration page information [is] *available at the user side*.” This aspect of the invention is specifically recited in Claim 1 lines 4-5 and is an additional aspect of Claim 1 not found in Banga. Rather, Banga teaches delta information stored in a cache server or  
5 a content provider and sent to the client at a later time (Abstract lines 6-9). Further, according to Claim 1, the “delta configuration page information available at the user side” is associated with “receiving user input.” These further aspects of the invention are not taught in Banga. Specifically, Banga does not include receiving a user input that is associated with delta configuration page information available at the user side,” as recited  
10 in Claim 1 lines 4-5. Yet further, Claim 1 includes “retrieving the delta configuration page information” (lines 5-6) “responsive” (line 4) to “the user side receiving a user input that is associated with delta configuration page information available at the user side” (lines 6-4). Because Banga does not teach “the user side receiving a user input that is associated with delta configuration page information available at the user side” it cannot  
15 teach “retrieving the delta configuration page information” “responsive” to the same.

The applicant respectfully requests that the Examiner point out the above teachings in Banga or allow Claim 1 and Claims 2-6 which depend therefrom.

*Regarding Claim 2:*

Claim 2 is dependent on Claim 1 and recites “wherein the delta configuration  
20 page information is comprised of a *control delta* that represents *changes* in a *control* of the configuration page as a *result of the user input*.” The examiner cites page 295 of Banga as teaching “deltas controlling based upon client request.” The applicant is not able to find this specific teaching on the cited page and requests a more specific direction.

Further, the applicant is not able to find a teaching anywhere in Banga of a “control” of the configuration page represented by a “control delta.” Further, the applicant is not able to find any teaching in Banga of the “changes in a control” being a “result of the user input.” It appears that all of the changes in Banga are a result of updating a page on a server, and then updating a cached copy. The applicant respectfully points out that these changes are not representative of “changes in a control of the configuration page as a result of the user input.” The Applicant requests that the Examiner more specifically point out these aspects of Claim 2 in Banga or allow the claim.

*Regarding Claim 3:*

Claim 3 is dependent on Claim 1 and recites “wherein the delta configuration page information embodies *preprocessed configuration engine* computations that are responsive to the user input.” In the current office action the Examiner suggests that this is equivalent to “computing the delta” and directs the applicant generally to page 295 of Banga. The Applicant is, however, unable to find any teaching of a “configuration engine” within the teachings of Banga, much less “preprocessed” “computations” by this engine. Further, the deltas of Banga are in no way responsive to “the user input.” Rather they appear to be responsive to changes made to an original page at a server. The Applicant requests that the Examiner more specifically point out these aspects of Claim 3 in Banga or allow the claim.

*Regarding Claim 4:*

Claim 4 is dependent on Claim 1 and recites : wherein the updating step further comprises: layering the delta configuration page information that is associated with the user input into the configuration page via Dynamic HTML.” The Applicant respectfully

points out that neither Banga nor Sutcliffe teach “delta configuration page information... associated with the user input.” Further, neither Banga nor Sutcliffe teach “layering the delta configuration page information” by *any* method. The Applicant requests that the examiner explicitly point out these teachings in Banga and Sutcliffe, or allow Claim 4.

5 *Regarding Claim 5:*

Claim 5 recites “wherein the updating step is performed by a process that is embedded in the configuration page.” The applicant is not able to find any teaching within Banga of a “process” being “embedded” in a page, much less a process capable of performing the updating step. The Examiner directs the Applicant to a range of pages  
10 within Banga to find these teachings. The Applicant requests that the Examiner more specifically point out each of these teachings in Banga or allow Claim 5.

*Regarding Claim 6:*

Claim 6 is dependent on Claim 1 and recites “wherein the delta page information is embedded in the configuration page.” The applicant is not able to find any teaching  
15 within Banga of “delta configuration page information ” being “embedded” in a page *to be updated*. In the scheme of Banga this would not make sense because the only reason for delta information is to update stale pages. Banga would not have any reason to embed the delta information in the page to be updated, they would just update the page. The Examiner directs the Applicant to a range of pages within Banga to find these  
20 teachings. The Applicant requests that the Examiner more specifically point out each of these teachings in Banga or allow Claim 6.

*Regarding Claim 7:*

Claim 7 recites “a method for transmitting product configuration information generated by a server side of an Internet-based configuration system to a user side of the configuration system.” The Applicant is unable to find any teaching of either “product configuration information” or of “an Internet-based configuration system” within the teachings of Banga, and requests that the Examiner specifically point out these teachings within Banga, or allow Claim 7 and Claims 8-13 which depend therefrom.

Further, Claim 7 recites “generating a configuration page that allows a user to provide a user input to the configuration system.” The Applicant is unable to find any teaching of a page that allows a user to provide input to the configuration system, and requests that the Examiner specifically point out these teachings in Banga, or allow Claim 7 and 8-13 which depend therefrom.

*Regarding Claim 8:*

Claim 8 is dependent on Claim 7 and recites “wherein the associating step is performed as part of the generating step.” The Applicant is unable to find any teaching of associating delta information with a page when that page is generated, within Banga. In contrast, Banga specifically teaches that delta information is generated when a page is changed not when it is generated. It is, thus, impossible to do the association as part of the generation under Banga. The Applicant requests that the Examiner specifically point out these teachings in Banga or allow Claim 8.

*Regarding Claim 9:*

Claim 9 is dependent on Claim 7 and recites “wherein the delta configuration page information is contained in a *look-up table* and the associating step further comprises.” The Applicant is unable to find teaching of a look-up table in Banga, much

less storage of delta configuration page information in the look-up table. The Applicant requests that the Examiner specifically point out these teachings in Banga or allow Claim 9.

5 Claim 9 further recites “*organizing* the delta configuration page information within the look-up table pursuant to an *indexing scheme*.” The Applicant is unable to find teaching of either how the delta configuration page information should be organized or of an indexing scheme in Banga. The Applicant requests that the Examiner specifically point out these teachings in the cited art in Banga or allow Claim 9.

10 Claim 9 further recites “embedding the look-up table in the configuration page.” Again, the Applicant is unable to find any teaching of embedding within the configuration page, much less embedding of a look-up table, in Banga. The Applicant requests that the Examiner specifically point out these teachings in Banga or allow Claim 9.

*Regarding Claim 10:*

15 Claim 10 is dependent on Claim 7 and recites “wherein the delta configuration page information is *indexed* according to *specific user inputs* that can be *provided from the configuration page*, each specific user input being *related to a portion of the delta configuration page information*.” Applicant is unable to find any teaching of any of the aspects highlighted above using italics, in the teachings of Banga. The Applicant  
20 requests that the Examiner specifically point out these teachings in Banga or allow Claim 10.

*Regarding Claim 11:*

Claim 11 is dependent on Claim 7 and recites “wherein the delta configuration page information is *comprised of a control delta* that represents *changes in a control of the configuration page as a result of the user input*. Applicant is unable to find any teaching of any of the aspects highlighted above using italics, in the teachings of Banga.

- 5 The Applicant requests that the Examiner specifically point out these teachings in the cited art or allow Claim 11.

*Regarding Claim 12:*

- Claim 12 is dependent on Claim 7 and recites “wherein the delta configuration page information *embodies preprocessed configuration engine computations* that are  
10 *responsive to the user input*.” Applicant is unable to find any teaching of any of the aspects highlighted above using italics, in the teachings of Banga. The Applicant requests that the Examiner specifically point out these teachings in Banga or allow Claim 12.

*Regarding Claim 13:*

- 15 Claim 13 is dependent on Claim 7 and recites “*transmitting a process* for updating the configuration page *with the delta configuration page information to the user side* from the server side.” Applicant is unable to find any teaching of any of the aspects highlighted above using italics, in the teachings of Banga. The Applicant requests that the Examiner specifically point out these teachings in Banga or allow Claim 13.

- 20 *Regarding Claim 14:*

Claim 14 recites “a method for receiving over the Internet product configuration information generated by *an Internet-based configuration system*, the method comprising: *responsive to receiving a user input* that is not associated with locally



available delta configuration page information, requesting a *new configuration page*; and receiving the *new configuration page* and delta configuration page information that is *associated with the new configuration page*.” Applicant is unable to find any teaching of any of the aspects highlighted above using italics, in the teachings of Banga. The

5 Applicant requests that the Examiner specifically point out these teachings in Banga or allow Claim 14.

*Regarding Claim 15:*

Claim 15 is dependent on Claim 14 and recites “wherein in *response to receiving a particular user input, the delta configuration page information is combined* with the

10 *configuration page thereby defining a new configuration page* that is *responsive to the particular user input*.” Applicant is unable to find any teaching of any of the aspects highlighted above using italics, in the teachings of Banga. The Applicant requests that the Examiner specifically point out these teachings in the cited art or allow Claim 15.

*Regarding Claim 16:*

15 Claim 16 recites “a method for transmitting page information generated on a server side of a network to a client side of that network, the method comprising: *responsive to receiving a request for page information* that is not available at the client side, *generating a page that reflects the requested information and is associated with delta page information*; and transmitting *the page and the delta page information to the*

20 *client side*.” Applicant respectfully submits that Banga does not teach generating a page associated with delta page information, because in Banga when a page is generated it cannot yet be stale – and, therefore, needs no delta information. Applicant is unable to find any teaching of any of the aspects highlighted above using italics, in the teachings of

Banga. The Applicant requests that the Examiner specifically point out these teachings in Banga or allow Claim 16.

*Regarding Claim 17:*

Claim 17 recites a “method for updating a page on a client side of a network  
5 *without having to contact a server side* of that network, the method comprising:  
*responsive to the client side receiving a user input that is associated with delta page*  
*information available at the client side*, retrieving the delta page information; and  
updating the page based on the delta page information.” Applicant is unable to find any  
teaching of any of the aspects highlighted above using italics, in the teachings of Banga.  
10 The Applicant requests that the Examiner specifically point out these teachings in Banga  
or allow Claim 17.

*Regarding Claim 18:*

Claim 18 recites a “method for receiving page information on a client side of a  
network from a server side of that network, the method comprising: *responsive to*  
15 *receiving a user input* that is not associated with *delta page information available at the*  
*client side*, requesting a new page; and *receiving the new page and delta page*  
*information that is associated with the new page*.” Applicant is unable to find any  
teaching of any of the aspects highlighted above using italics, in the teachings of Banga.  
The Applicant requests that the Examiner specifically point out these teachings in Banga  
20 or allow Claim 18.

*Regarding Claim 19:*

Claim 19 recites a “computer-readable medium having instructions stored thereon which, when executed by a *processor included on a user side* of an Internet-based configuration system, cause *the processor to perform* the steps of: responsive to the user side *receiving a user input* that is *associated with delta configuration page information* available *at the user side*, retrieving the delta configuration page information; and *updating a configuration page based on the delta configuration page information without having to contact a server side* of the configuration system.” Applicant is unable to find any teaching of any of the aspects highlighted above using italics, in the teachings of Banga. The Applicant requests that the Examiner specifically point out these teachings in Banga or allow Claim 19.

*Regarding Claim 20:*

Claim 20 recites a “computer-readable medium having instructions stored thereon which, when executed by a *processor included on a server side* of an Internet-based configuration system, cause the processor to perform the steps of: *generating a configuration page that allows a user to provide input to the configuration system; associating delta configuration page information with the configuration page; and transmitting the configuration page and the delta configuration page information.*” Applicant is unable to find any teaching of any of the aspects highlighted above using italics, in the teachings of Banga. The Applicant requests that the Examiner specifically point out these teachings in Banga or allow Claim 20.

*Regarding Claim 21:*

Claim 21 recites a “computer-readable medium having instructions stored thereon which, when executed by a processor included on a user side of an Internet-based

*configuration system, cause the processor to perform the steps of: responsive to receiving a user input that is not associated with delta configuration page information available at the user side, requesting a new configuration page; and receiving the new configuration page and delta configuration page information that is associated with the new*

- 5 configuration page.” Applicant is unable to find any teaching of any of the aspects highlighted above using italics, in the teachings of Banga. The Applicant requests that the Examiner specifically point out these teachings in Banga or allow Claim 16.

*Regarding Claims 9-21:*

Claims 9-21 clearly include many aspects not included in Claims 1-3 and 5-7.

- 10 However, the only arguments the Examiner presents with regard to these claims is to point to his arguments associated with Claims 1-3 and 5-7. The Applicant solicits more explicit recitation of how Banga teaches the additional aspects of Claims 9-21 and respectfully points out that any arguments directed at these aspects in the next office action will be new.

- 15 *Regarding Claims 1-21:*

In discussing Claims 1-21 the Applicant has pointed out particular aspects not taught in the cited art. There are other aspects, also not taught in the cited art, that the Applicant has not pointed out for the sake of brevity.

*Regarding Claims 22-34:*

- 20 Claims 22-34 are added in order to claim further aspects of the invention. Support for these claims are found in the application as filed.

## CONCLUSION

Based on the above amendments and remarks, Applicant respectfully requests the entry of the above amendments and submit that, as amended, all pending claims are in condition for allowance. Thus, the claims of the present application are believed to be allowable based on Applicant's above amendments and remarks. Therefore, the Applicant submits that the application is in condition for allowance, and respectfully request the issuance of a Notice of Allowability.

If the Examiner has any questions or would like to discuss this case, he is invited to contact the Applicants' undersigned representative at the number given below.

Respectfully submitted,

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